

To: 'SWhitworth@ameren.com'[SWhitworth@ameren.com]
Cc: Jay, Michael[Jay.Michael@epa.gov]; Bybee, Darcy[darcy.bybee@dnr.mo.gov]; Wilbur, Emily[emily.wilbur@dnr.mo.gov]
From: Moore, Kyra
Sent: Tue 3/8/2016 2:45:17 PM
Subject: FW: Labadie Site Specific Study/Beta Options

Steve,

Please see below for EPA's comments on the beta options. We will set up a conference call to discuss soon.

Kyra

From: Jay, Michael [mailto:Jay.Michael@epa.gov]
Sent: Monday, March 07, 2016 12:04 PM
To: Moore, Kyra
Cc: Bybee, Darcy; Algae-Eakin, Amy; Peter, David; Meyer, Jonathan
Subject: Labadie Site Specific Study/Beta Options

Kyra,

Over the past several weeks, we have received several communications from both MDNR and Ameren related to technical analyses and characterizations of Labadie Energy Center for the 2010 1-hour SO₂ NAAQS. On December 9, 2015, the Missouri Department of Natural Resources transmitted to EPA a request from Ameren that EPA consider an alternative model demonstration in support of 1-hr SO₂ NAAQS designation for the area around Ameren's Labadie Energy Center. On February 17, 2016, Mr. Steve Whitworth, Senior Director of Environmental policy and Analysis at Ameren, provided additional information to MDNR and copied EPA. This information related to the dispersion modeling approach for Labadie and is requested to be supplemental information to the December 9, 2015 communications. On February 24, 2016, Mr. Steve Whitworth provided to EPA, via email, a request for two items. First, he requested to meet with EPA Region 7 technical staff to discuss the December 9, 2015 request for consideration of the use for an alternative model demonstration, and second, he requested that EPA Region 7, so as to assure complete transparency, submit the material and request for a case by case approval to the Modeling Clearinghouse for review and approval as soon as possible in like of the pending designation decision.

In response to the December 9, 2015 MDNR request and as outlined in the Technical Support Document for the Missouri Area Designations for the 2010 SO₂ Primary National Ambient Air Quality Standard, EPA Region 7 has evaluated the submitted proposal, and has determined that the analysis provided by MDNR does not meet the requirements in accordance with the current Appendix W for the use of LOWWIND3 beta option at this time. We consulted with the Model Clearinghouse on this determination.

In regards to the February 17 and 24, 2016 communications, EPA acknowledges this email and recognizes Ameren's request. However, in order to appropriately evaluate the materials submitted, review consistently with the EPA's Model Clearinghouse procedures, and proceed as Ameren's request, EPA requests the following information from Ameren in order to consider their request:

- SO₂ monitoring data collected at recently installed NW and NE monitors sites nearby Labadie in electronic format (xls or csv)
- Meteorological monitoring data collected at recently installed NE monitor Met Tower nearby Labadie in electronic format (xls or csv)
- All audit or quality assurance reports (SO₂ and Meteorological monitoring) for data collected around Labadie.
- Supporting analysis used to infer the background concentration of 4 ppb discussed on page 14 of Labadie SO₂ Characterization Update_09feb16.pdf
- All stack temperature data in electronic format (xls or csv). Stack temperatures should be provided for all available heights where they are recorded, with collection height specified, by individual unit.
- All historic 1984 85-meter onsite metrological data collected and presented in Figure 4 of Labadie SO₂ Characterization Update_09feb16.pdf, in electronic format (xls or csv). Please include latitude and longitude of 1984 85-meter tower (Station 11)
- Any historical surface meteorological data collected during the 1984-1998 period surrounding Labadie.
- All WRF inputs and outputs, including any model performance evaluations performed for data presented in Table 2 of Labadie SO₂ Characterization Update_09feb16.pdf.
- All post processed WRF data outputs for use with AERMOD or AERMET including run settings if MMIF was used.

- All inputs and outputs of AERMOD data supporting Figures 8 – 12 of Labadie SO2 Characterization Update_09feb16.pdf
- Additional explanation regarding the basis and data analysis supporting this statement on page 3 of Labadie SO2 Characterization Update_09feb16.pdf. “Second and equally as important, the monitor was sited in a direction with frequent winds from Labadie.”

If you would like to discuss our review of your request, please feel free to contact me directly at (913) 551-7460 or contact Amy Algoe-Eakin at (913) 551-7942.

Mike Jay

Branch Chief

Air Planning and Development Branch

USEPA R7

913-551-7460